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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

Valentino Dimitrov, individually, and on
behalf of all others similarly situated;

Plaintiffs,

vs.

Stavatti Aerospace, Ltd, a Minnesota
corporation; Stavatti Aerospace, Ltd, a
Wyoming corporation; Stavatti
Corporation, a Minnesota corporation;
Stavatti Immobiliare, Ltd, a Wyoming
corporation; Stavatti Industries, Ltd, a
Wyoming corporation; Stavatti Niagara,
Ltd., a New York corporation; Stavatti
Super Fulcrum, Ltd, a Wyoming
corporation; Stavatti Ukraine, a Ukrainian
business entity; Stavatti Ukraine, a
Ukrainian business entity; Stavatti Heavy
Industries Ltd, a Hawaii corporation;
Christopher Beskar and Maja Beskar,
husband and wife; John Simon and Jean
Simon, husband and wife; William
McEwen and Patricia McEwen, husband
wife; Rudy Chacon and Jane Doe Chacon,
husband and wife; and DOES 1 through
10, inclusive,

Defendants.

Case No.: CV-23-00226-PHX-DJH

**DECLARATION OF GEORGE
CHEBAT IN SUPPORT OF
APPLICATION FOR ENTRY OF
DEFAULT AGAINST DEFENDANTS
STAVATTI NIAGARA LTD; JOHN
SIMON AND JEAN SIMON**

1 I, George Chebat, declare under penalty of perjury that the following is true and
2 correct:

3 1. I am one of the attorneys for Plaintiff and I am familiar with the file, records
4 and pleadings in this matter.

5 2. The Complaint was filed on February 3, 2023. (Doc. 1)

6 3. Defendant John Simon and Jean Simon, husband and wife was served on
7 February 23, 2023. And Defendant Stavatti Niagara, Ltd, a New York corporation was
8 served on February 23, 2023, as reflected in the proof of service filed on March 28, 2023.
9 (Doc. 7).

10 4. Defendants Answer or other responses to the Complaint were due on or
11 before March 27, 2023.

12 5. To date, the above-named Defendants have failed to plead or otherwise
13 defend within the time allowed and therefore are now in default.

14 6. Plaintiff requests that the Clerk of the Court enter default against each of the
15 Defendants, jointly and severally.

16 7. In compliance with the requirements of 50 U.S.C. § 520, I verify that to the
17 best of my knowledge, information and belief the Defendants are not in the military
18 service.

19 WHEREFORE, the undersigned requests the Clerk of this Court to enter default of
20 the Defendants, Stavatti Niagara, Ltd; John Simon and Jean Simon.
21

22 **DATED** March 28, 2023.

23
24 **ENARA LAW, PLLC**

25 By: /s/ George Chebat
26 George Chebat
27 Joseph J. Toboni

Daniel de Julio
Attorneys for Plaintiff

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